

Remarks

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 20 – 26, 28, and 30 - 32 are pending in the application. Claims 20 – 26, 28, and 30 - 32 have been rejected. No claims have been amended.

The Telephone Interview

Initially, Applicants wish to thank the Examiner, Brian Albertalli, for granting and attending the telephone interview, with Applicants' Representative, Heidi M. Brun, Reg. No. 34,504, on November 2, 2006. In the interview, the combination of Stammli et al. with Brown et al. was discussed.

Applicants' Representative argued that Stammli et al. cannot be combined with Brown et al.

Stammli et al. teaches a speech dialog system that has two recognition engines. The system can be used for voice dialing, their main embodiment, or for other devices, such as controlling various parts of a car (see col. 19, line 22 – col. 20, line 20). However, Stammli et al. teaches using the same speech dialog system for all of the various devices. ("That the speech dialog system in the motor vehicle is used for one or several of the functions named in the following:" col. 19, lines 22 – 24). Thus, Stammli et al. teaches using the same two engines for all devices.

Brown et al., on the other hand, has multiple engines, but for a very different type of system. As argued in the interview, Brown et al. describes an IVR (interactive voice response) type system, where the IVR system prompts the user to answer its questions. Brown et al. describe an airline reservation system:

“A user dialing a predetermined number associated with the airline reservation and information system is connected to system 100 via network 200. Processor 110 instructs the user with a stored prompt from database 108 requesting the user to speak his account number. For example, in the airline reservation embodiment, the prompt could be “What is your account number?” (see col. 4, lines 15 – 22)

An IVR system, such as Brown et al., is fundamentally different than a speech dialog system controlling various devices. An IVR system is a menu-driven system which asks the user for information that the IVR system then enters into its database. An IVR designer knows exactly the type of answers he is expecting for each prompt and thus, can select the type of speech recognizer(s) to activate for each answer.

The speech dialog system described by Stammler et al., on the other hand, is a user-driven system, where the user commands the various devices to do his/her bidding. The type of speech to be received is not always known *a priori* as it depends on what the user wants to do. Thus, the type of speech recognizer to operate is not always known. Thus, as argued in the interview, Brown et al. cannot be combined with Stammler et al. since purposes of the devices they are designed for are different.

Furthermore, as Applicants’ Representative argued, even if they were combinable, neither of them is “feature-specific”. Stammler et al. uses the same two speech recognition engines for all of the different devices of a car. The speech recognizers are not specific to anything, neither to the different devices nor to the features of the different devices. Brown et al. also is not feature specific. IVR systems do not have multiple features. They have a single feature, the menu. Moreover, Brown et al. chooses which speech recognizers to operate according to the expected answer to a single question and not as a function of the type of feature of the device.

Thus, neither Stammler et al., nor Brown et al., nor their combination produces:
“at least two speech recognition engines each specific to one non-dialing feature of the device to perform recognition on a voice input”
as required by claims 20 and 28.

The Examiner accepted these arguments but considered the possible need for further search.

Claim Rejections

35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claims 20 – 24, 26, 28 and 30 – 31 under 35 U.S.C. §103(a), as being unpatentable over Stammli et al. (US 6,839,670) in view of Brown et al. (US 6,377,922).

This combination was discussed in the interview, as described above.

Applicants respectfully assert that this rejection should be withdrawn.

In the Office Action, the Examiner rejected claims 25 and 32 under 35 U.S.C. §103(a), as being unpatentable over Stammli et al. in view of Brown et al. and further in view of Applicant's Admitted prior art.

The Examiner stated:

"Furthermore, with regard to the argument that "it didn't occur to anyone ... to make speech recognition engines specific to those non-dialing feature", as explained above, the incorporation of a separate speech recognition engine for each available feature of a device would have been obvious to one of ordinary skill in the art at the time of the invention, in view of Stammli et al. and Brown et al. Further, while Stammli et al. and Brown et al. do not teach the specific features of claims 25 and 32 (selected from a group of MESSAGES, CALENDAR, TO DO, MEMO, FAX, and EMAIL), it is well known in the art to include these features in a device. Therefore a combination of Stammli et al. and Brown et al. and the Applicant's admitted prior art would include a separate speech recognition engine for each of the specific features listed in claims 25 and 32." (Office Action, page 4, lines 1 - 11)

Applicants respectfully disagree. As discussed hereinabove, neither Stammli et al. nor Brown et al. nor their combination teach "at least two speech recognition engines each specific to one non-dialing feature of the device". The addition of Applicant's Admitted prior art does not cure this deficiency, since Applicant's Admitted prior art only includes the non-dialing features and there is no teaching in the prior art to provide speech recognition engines for such non-dialing features. Neither Stammli et al. nor Brown et al. teach providing speech recognition engines for such non-dialing features.

Therefore, Applicants respectfully assert that claims 25 and 32 are allowable.

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.


Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Conclusion

It is submitted that all the pending claims are now in a condition for allowance. Reconsideration of the application and issuance of a notice of allowance are respectfully requested.

It is believed that a one month extension of time is required for this matter. Applicant hereby petitions for same and requests that any extension or other fee required for timely consideration of this application be charged to Deposit Account No. 19-4972. The Examiner is requested to telephone the undersigned if any matters remain outstanding so that they may be resolved expeditiously.

Respectfully submitted,


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